

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a partner with the Meshbesh & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit A is a true and correct copy of the March 30, 2017 expert report of Jonathan Samet, M.D., M.S.
3. Attached hereto as Exhibit B is a true and correct copy of McGovern et al., *An Investigation of Theatre Ventilation, Patient Warming and Joint Replacement Infection in Orthopaedics*, 93B:11 J BONE & JOINT SURG. 1537-44 (Nov. 2011).
4. Attached hereto as Exhibit C is a true and correct copy of the June 1, 2017 expert report of Theodore Holford, Ph.D.
5. Attached hereto as Exhibit D is a true and correct copy of the deposition of Theodore Holford, Ph.D, which occurred in Hartford, Connecticut on July 18, 2017.
6. Attached hereto as Exhibit E is a true and correct copy of the deposition of Mark Albrecht, M.S., M.B.A., which occurred in Minneapolis, Minnesota on October 7, 2016.

7. Attached hereto as Exhibit F is a true and correct copy of the deposition of Christopher Nachtsheim, Ph.D., which occurred in Minneapolis, Minnesota on November 29, 2016.
8. Attached hereto as Exhibit G is a true and correct copy of the deposition of Michael Reed, M.D., which occurred in London, United Kingdom on December 4, 2016.
9. Attached hereto as Exhibit H is a true and correct copy of the deposition of Paul McGovern, M.B.B.S., M.R.C.S., which occurred in London, United Kingdom on January 5, 2017.
10. Attached hereto as Exhibit I is a true and correct copy of McGovern Exhibit 23, which was marked at the January 5, 2017 deposition of Paul McGovern, M.B.B.S., M.R.C.S.
11. Attached hereto as Exhibit J is a true and correct copy of J.H. McDonald, HANDBOOK OF BIOLOGICAL STATISTICS (3d ed. 2014).
12. Attached hereto as Exhibit K is a true and correct copy of Gent et al., *Levels of Household Mold Associated with Respiratory Symptoms in the First Year of Life in a Cohort at Risk for Asthma*, 110:12 ENV. HEALTH PERSPECTIVES 785 (2002).
13. Attached hetero as Exhibit L is a true and correct copy of Holford et al., *Clock-Cancer Connection in Non-Hodgkin Lymphoma*, 69(8) CANCER RES. 3605 (2009).
14. Attached hereto as Exhibit M is a true and correct copy of Wasserstein et al., *The ASA's Statement on P-Values*, 70(2) THE AMERICAN STATISTICIAN 131 (2016).
15. Attached hereto as Exhibit N is a true and correct copy of Goodstine et al., *Dietary (n-3)/(n-6) Fatty Acid Ratio: Possible Relationship to Premenopausal but Not Postmenopausal Breast Cancer Risk in U.S. Women,* 133 J NUTR. 1409 (2003).
16. Attached hereto as Exhibit O is a true and correct copy of Holford et al., *Time Trends of Non-Hodgkin Lymphoma: Are they Real?*, 52 CANCER RES. SUPP. 5443-46 (1992).

17. Attached hereto as Exhibit P is a true and correct copy of Van Duren Exhibit 77, which was marked at the November 7, 2016 deposition of Albert Van Duren.
18. Attached hereto as Exhibit Q is a true and correct copy of the deposition of Albert Van Duren, which occurred in Minneapolis, Minnesota on November 7, 2016.
19. Attached hereto as Exhibit R is a true and correct copy of Triche et al., *Infant Respiratory Symptoms Associated with Indoor Heating Sources*, 166 AM J RESP. CRITICAL CARE MED. 1105-1111 (2002).
20. Attached hereto as Exhibit S is a true and correct copy of McGovern Exhibit 22, which was marked at the January 5, 2017 deposition of Paul McGovern, M.B.B.S., M.R.C.S.
21. Attached hereto as Exhibit T is a true and correct copy of Jensen et al., *Return to theatre following total hip and knee replacement, before and after the introduction of rivaroxaban*, 93-B(1) J BONE & JOINT SURGERY BR. (2011).
22. Attached hereto as Exhibit U is a true and correct copy of Eriksson et al., *Rivaroxaban versus Enoxaparin for Thromboprophylaxis after Hip Arthroplasty*, 358(26) N. ENGL. J. MED. (2008).
23. Attached hereto as Exhibit V is a true and correct copy of Kakkar et al. *Extended Duration Rivaroxaban versus Short-Term Enoxaparin for the Prevention of Venous Thromboembolism after Total Hip Arthroplasty*, 372 LANCET 31-39 (2008).
24. Attached hereto as Exhibit W is a true and correct copy of Lassen et al., *Rivaroxaban versus Enoxaparin for Thromboprophylaxis after Total Knee Arthroplasty*, 358(26) N. ENG. J. MED. (2008).
25. Attached hereto as Exhibit X is a true and correct copy of Turpie et al., *Rivaroxaban versus Enoxaparin for Thromboprophylaxis after Total Knee Arthroplasty (RECORD 4)*, 373 LANCET 1673-80 (2009).
26. Attached hereto as Exhibit Y is a true and correct copy of Jameson et al., *Wound Complications Following Rivaroxaban Administration*, 94 J BONE JOINT SURG. AM. 1554-8 (2012).

27. Attached hereto as Exhibit Z is a true and correct copy of Breslow et al., *Statistical Methods in Cancer Research*, [p. 103-107] (Int'l Agency for Research on Cancer, Lyon FR 198).
28. Attached hereto as Exhibit AA is a true and correct copy of Holford et al., *Confounding in Epidemiologic Studies*, 45 BIOMETRICS 1309-1322 (1989).
29. Attached hereto as Exhibit BB is a true and correct copy of Hickson et al., *Prophylactic Antibiotics in Elective Hip and Knee Arthroplasty*, 4 BONE JOINT RES. 181-189 (2015).
30. Attached hereto as Exhibit CC is a true and correct copy of Melling et al., *Effects of Preoperative Warming on the Incidence of Wound Infection After Clean Surgery*, 358 LANCET 876-80 (2001).
31. Attached hereto as Exhibit DD is a true and correct copy of Nachtsheim Exhibit 27, marked at the November 29, 2016 deposition of Christopher Nachtsheim, Ph.D.

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

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